

REMARKS**Claim Rejections Under 35 U.S.C. §103**

Claims 1, 2, 5 – 13, and 15 were rejected under 35 U.S.C. §103(a) as being anticipated over *Chen et al.* (U.S. Patent No. 6,324,602) in view of *Silverbrook* (U.S. Patent Publication No. 2002/0071104). Applicants respectfully traverse this rejection.

Chen et al. discloses an input/output interface for an integrated circuit device. *Chen et al.* additionally discloses a RAMBUS memory device as applied to a DRAM (column 1, line 66 – col. 2, line 9), a flash memory device, and a DRAM that transfers data on both edges of a clock (column 1, lines 55 – 57). However, *Chen et al.* neither teaches nor suggests a flash memory that has RAMBUS – compatible interconnections and circuitry to provide two data access operations per clock cycle as claimed in the present application.

The flash memory device mentioned in *Chen et al.* is mentioned only in reference to typical memory devices and no detail is provided as to any flash memory functionality. The DRAM disclosed in *Chen et al.* cannot be equated with a flash memory since they have different bus interconnections, functions, and transistor architecture.

Silverbrook discloses an image sensing apparatus that includes a microcontroller and memory. The memory includes a 4 Mbyte flash memory 70 and DRAM with a RAMBUS interface 81. There is no teaching or suggestion that the flash memory includes, can include, or even a desire to include the RAMBUS interface, as claimed in the present invention. Figure 3 clearly shows and paragraphs 450 and 454 state that the flash memory and the DRAM with the RAMBUS interface are completely separate components.

To establish a *prima facie* case of obviousness, three basic criteria must be met: (1) There must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings; (2) There must be a reasonable expectation of success; (3) The prior art references must teach or suggest *all* the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on appellants' disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

Regarding the first criteria, there is no suggestion or motivation in either reference to combine the reference teachings. There is no suggestion or motivation in either reference for a need for a flash memory device with a RAMBUS interface.

Regarding the second criteria, since neither *Chen et al.* nor *Silverbrook* individually teach or suggest a flash memory that has a RAMBUS interface, there can be no reasonable expectation of success for producing, if the two references were combined, a flash memory device with a RAMBUS interface. Regarding the third criteria, even if it were obvious to combine *Chen et al.* with *Silverbrook*, and Applicants maintain that it is not, the combination cannot teach or suggest all of the claim limitations since neither suggests or discloses a RAMBUS interface in a flash memory.

None of the three criteria have not been met. Therefore, a *prima facie* case of obviousness has not been made.

Double Patenting Rejection

Claims 1 – 8, 11, 14, and 15 were rejected under the judicially created doctrine of obviousness-type double patenting as being unpatentable over claims 1 – 5 of U.S. Patent No. 6,741,497. Applicant has included a Terminal Disclaimer herewith to address the rejection. In view of the Terminal Disclaimer, Applicant respectfully requests reconsideration and withdrawal of the rejection, and allowance of claims 1 – 8, 11, 14, and 15.

CONCLUSION

In view of the above remarks, Applicants respectfully submit that all claims are now in condition for allowance and request reconsideration of the application and allowance of the claims. If the Examiner has any questions or concerns regarding this application, please contact the undersigned at (612) 312-2211. No new matter has been added and no additional fee is required by this response.

Respectfully submitted,

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